

REMARKS

Claims 1-19 are pending in this application. By this Amendment, claims 1, 8, and 15 have been amended. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Reconsideration in view of the above amendments and following remarks is respectfully requested.

In the Office Action, claims 1-3, 5-10, and 12-18 are rejected under 35 U.S.C. §102(c) as allegedly being anticipated by Gryglewicz (US Patent No 6,993,502). Applicants submit that the claimed subject matter is allowable for the reasons that follow.

With respect to independent claims 1, 8, and 15, Applicants respectfully assert that Gryglewicz does not teach or suggest each and every feature of the claims. For example, Gryglewicz does not disclose, *inter alia*, “**a plurality of tax calculators**, each calculator configured to calculate a different tax, wherein each tax calculator includes an interface for receiving calculator-specific requests in a non-industry standard format,” as recited in claim 1 and similarly recited in claims 8 and 15. (Emphasis added). The Office points to Col. 9, lines 7-42; Col. 26, line 48-Col. 27, line 17 as allegedly teaching selecting one of a plurality of tax calculators to handle the request. See Office Action, page 3. Applicants have reviewed Gryglewicz and in Col. 9, lines 7-42, Gryglewicz discloses “a tax computing engine 70 (shown in FIG. 8) [that] calculates the sales or other taxes associated with the customer’s purchase.” In Col. 26, line 48-Col. 27, line 17, Gryglewicz describes the tax computing engine 70. Applicants interpret the Office as asserting that the tax computing engine 70 of Gryglewicz

allegedly teaches the plurality of tax calculators. However, Applicants respectfully disagree and submit that Gryglewicz does not provide more than one tax calculator. To this extent, there is only one tax computing engine in Gryglewicz, not a plurality. Further, Gryglewicz does not provide each tax calculator to be configured to calculate a different tax. Therefore, Applicants submit that Gryglewicz does not teach or suggest each and every feature of the claimed invention.

Further, Gryglewicz does not disclose “a translator for translating the tax calculation requests from the industry standard format to a format required for one of the plurality of tax calculators,” as recited in claim 1 and similarly recited in claims 8 and 15. The Office points to Col. 26, line 48-Col. 27, line 17 and Col. 37, lines 25-36 of Gryglewicz as allegedly teaching this translator. However, Applicants respectfully disagree.

First, Applicants submit that Col. 26, line 48-Col. 27, line 17 of Gryglewicz is also pointed to by the Office as allegedly teaching the plurality of tax calculators. Applicants assert that this single feature of Gryglewicz cannot be used to teach both the plurality of tax calculators and the translator of the claimed invention. Furthermore, the plurality of tax calculators is clearly different from the translator in the claimed invention, as the translator is disclosed as translating a request into a format for a particular tax calculator. As mentioned above, this section of Gryglewicz describes the tax computing engine 70; this section does not describe a translation of a request from one format to second format, where the second format is required by the selected tax calculator. Therefore, Gryglewicz does not teach or suggest the translator of the claimed invention.

Second, Applicants reassert arguments previously made in the Amendment of January 11, 2008 that the translator described in Col. 37, lines 33-36 is not the same translation as the claimed invention provides. The translator disclosed in Gryglewicz performs a “translation of the tax code for the tax authority” so that any tax criteria imposed by a tax authority can be computed. See Col. 37, lines 33-36. There is no disclosure in Gryglewicz submitting that the translation is for a format required by the tax calculator. Therefore, Applicants maintain that Gryglewicz fails to disclose each and every feature of the claimed invention.

In light of the above-stated reasons, Applicants contend that independent claims 1, 8, and 15 are in condition for allowance. Accordingly, Applicants respectfully request withdrawal of the rejections to independent claim 1, 8, and 15 as allegedly being anticipated by Gryglewicz. With respect to dependent claims 2-3, 5-7, 9-10, 12-14, and 16-18, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependent claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

In the Office Action, claims 4, 11, and 19 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Gryglewicz in view of Sullivan (US Publication No. 2003/0055754 A1). Applicants respectfully reassert arguments previously made in reference to independent claims 1, 8, and 15 that Gryglewicz does not disclose each and every feature of these claims. To this extent, Applicants maintain that these claims are patentable over Gryglewicz in view of Sullivan. Accordingly, since claims 4, 11, and 19 depend from claims 1, 8, and 15, respectively, Applicants request that the Office withdraw this rejection.

However, if the Office chooses to maintain these rejections, Applicants request that the Office further clarify how Gryglewixcz allegedly discloses the claimed invention. In particular, Applicants request that the Office specifically point out where Gryglewixcz provides a plurality of tax calculators and how Gryglewixcz teaches each tax calculator to be configured for a different tax. Further, Applicants request that the Office further clarify how Gryglewixcz provides the translator of the claimed invention that translates the tax calculation request from an industry standard format to a format required by one of the tax calculators.

CONCLUSION

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, he is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

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